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19 CHICAGO TITLE INSURANCE COMPANY

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21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**  
26 **DISTRICT OF NEVADA**

27 DEUTSCHE BANK NATIONAL TRUST  
28 COMPANY AS TRUSTEE FOR THE  
29 CERTIFICATEHOLDERS OF THE  
30 MORGANSTANLEY ABS CAPITAL I INC.  
31 TRUST 2003-NC10 MORTGAGE PASS-  
32 THROUGH CERTIFICATES, SERIES 2003-  
33 NC10,

34 Plaintiff,

35 vs.

36 FIDELITY NATIONAL TITLE GROUP,  
37 INC., et al.,

38 Defendants.

Case No.: 2:20-cv-02268-JCM-VCF

**STIPULATION AND  
ORDER EXTENDING DEFENDANT  
CHICAGO TITLE INSURANCE  
COMPANY'S TIME TO RESPOND  
TO MOTION FOR REMAND [ECF No.  
9] AND MOTION FOR FEES AND  
COSTS [ECF No. 10]**

**(First Request)**

Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff Deutsche Bank National Trust Company as Trustee for the Certificateholders of the Morgan Stanley ABS Capital I Inc. Trust 2003-NC10, Mortgage Pass-Through Certificates, Series 2003-NC10 (“Deutsche Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On December 15, 2020, Deutsche Bank filed its Complaint in the Eighth Judicial District Court, Case No. A-20-826490-C [ECF No. 1-1];
2. On December 15, 2020, Chicago Title filed a Petition for Removal to this Court [ECF No. 1];
3. On January 14, 2021, Deutsche Bank filed a Motion for Remand [ECF No. 9];
4. On January 14, 2021, Deutsche Bank filed a Motion for Costs and Fees [ECF No. 10];
5. Chicago Title’s deadline to respond to Deutsche Bank’s Motion for Remand and Motion for Costs and Fees is currently January 28, 2021;
6. Chicago Title’s counsel is requesting an extension until Thursday, February 11, 2021, to file its response to the pending Motion for Remand and Motion for Costs and Fees;
7. Chicago Title requests a brief extension of time to respond to the Motion for Remand and Motion for Costs and Fees to afford Chicago Title additional time to respond to the legal arguments set forth in Deutsche Bank’s motions;
8. Deutsche Bank does not oppose the requested extension;
9. This is the first request for an extension which is made in good faith and not for purposes of delay;

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1           **IT IS SO STIPULATED** that Chicago Title's deadline to respond to Deutsche Bank's  
2 Motion for Remand [ECF No. 9] and Motion for Costs and Fees [ECF No. 10] is hereby extended  
3 through and including February 11, 2021.  
4

5 Dated: January 22, 2021

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

6 By: /s/-- Sophia S. Lau  
7 SCOTT E. GIZER  
8 SOPHIA S. LAU  
9 Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY

10 Dated: January 22, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair  
12 KEVIN S. SINCLAIR  
13 Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY

14 Dated: January 22, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Lindsay D. Robbins  
16 LINDSAY D. ROBBINS  
17 Attorneys for Plaintiff DEUTSCHE BANK  
TRUST COMPANY

18 **IT IS SO ORDERED:**

19  
20           January 25, 2021

21 Dated: \_\_\_\_\_

By:   
UNITED STATES JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on January 22, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

